



SDMS DocID 559676

March 6, 1990

U.S. Environmental Protection Agency
Waste Management Division
JFK Federal Building, HSN-CAN5
Boston, MA 02203

Superfund Records Center
SITE: Coakley
BREAK: 11.9
OTHER: 559676

ATTENTION: Mr. Steven J. Calder

RE: Coakley Landfill
North Hampton and Greenland, New Hampshire

Gentlemen:

Jet-Line Services, Inc. hereinafter referred to as "Jet-Line" is in receipt of your "Notice of Potential Liability and Request for Participation in Cleanup Activities". As stated in our initial response dated August 26, 1988, Jet-Line has made a diligent effort to locate any information pertinent to the Agency's July 26, 1988 and February 3, 1990 notices. The information contained below is in direct response to your February 3, 1990 Notice.

1. Describe in detail how you or your company handled and disposed of all solid waste and hazardous waste, from 1972 to 1985, inclusive, including, but not limited to, the following details:
 - a. Describe whether your practices involved any segregation of wastes before disposal, and how you handled and disposed of each type of waste after segregation.

RESPONSE: From 1972 through 1985, Jet-Line provided solid waste and hazardous waste transportation services for thousands of generators to licensed or approved treatment and disposal sites throughout the United State. It has always been Jet-Line practice to send hazardous waste to state-approved hazardous waste landfills, and solid waste to appropriately approved disposal facilities. To the best of our knowledge, the Coakley Landfill has never had state approval for chemical waste and therefore Jet-Line would never use it as such purpose. The only known waste to have been disposed of at the Site resulted from a single specific incident. In 1979, Jet-Line responded to and conducted the cleanup of a virgin petroleum product spill from the vessel "New Concord". Under the direction of Mr. Michael Gallen, Field Engineer, with the State of New Hampshire, Department of Health Services, Jet-Line conveyed oil-contaminated debris to the landfill. No

Mr. Steven J. Calder
U.S. Environmental Protection Agency
Waste Management Division
Page Two

hazardous materials or wastes were conveyed with this debris and therefore no segregation was required. All oil-contaminated debris from the spill is believed to have been transported in bulk either in dump trucks or roll-off containers.

- b. Describe whether any of your waste handling and disposal practices changed during this period, and if so, on what date and describe the procedures in effect before and after each change.

RESPONSE: From the period 1972 through 1985, Jet-Line's waste handling and disposal practices changed significantly as a result of federal and state regulations and disposal facility operating procedures. However, Jet-Line never sent hazardous substances to any facility not approved by the State for those substances.

Any change in Jet-Line's practices during the specified time period had no impact on any solid waste conveyed from the "New Concord" spill.

- c. Provide any documentation you have concerning any such waste handling or disposal practices or procedures (for example, without limitation: manifests, invoices, purchase orders, internal memoranda, dump receipts, company policies), and give the name and current address of any person who might have knowledge of such practices or procedures.

RESPONSE: Jet-Line maintains all existing documentation regarding its waste transactions at its Stoughton corporate office. Because of the large volume of manifests, invoices, purchase orders, transporter records and reports for tens of thousands of transactions, Jet-Line cannot provide documentation request. Jet-Line will make available any specific existing documents upon request by the Agency.

Jet-Line has completed a diligent search of its existing records regarding its past use of the Coakley Landfill. We have not been able to locate any documents which indicate that Jet-Line transported hazardous substances excluding petroleum materials to the Coakley Landfill.

Mr. Steven J. Calder
U.S. Environmental Protection Agency
Waste Management Division
Page Three

2. Describe any knowledge you or your company have of the disposal of any industrial waste or liquid waste at the Site by you, your company or any other person or entity after or before regular business hours. Give the name and current address of any persons who might have knowledge of any such disposal.

RESPONSE: The only knowledge Jet-Line has of any disposal activities at the Coakley Landfill pertains to the disposal of oil debris associated with the cleanup of a petroleum spill from the "New Concord". Jet-Line transported the oily debris to the Coakley Landfill as directed by Mr. Michael Gallen, State of New Hampshire, Department of Health Services.

Jet-Line has no knowledge of any other persons who might have knowledge of any industrial waste or liquid waste at the Site.

3. List the name and current address of all entities for which you or your company transported any waste to the Site from 1972 to 1985.

RESPONSE: Jet-Line only transported oily debris to the Site as a result of the cleanup of the "New Concord" oil spill. We have no record or remembrance of the owner of the vessel at that time, nor knowledge of their current address.

Records of the spill retained by the State of New Hampshire may indicate the name of the vessel's owner.

In our July 26, 1988 and again in this response, Jet-Line has indicated that it only has knowledge of transporting oily debris to the Site as a result of a spill in 1979. There is no record or information that even suggests that Jet-Line conveyed hazardous waste to the Site. As stated in the Proposed Plan-EPA Proposes Cleanup Plan for Coakley Landfill Site, February 1990, Page 8, see below, the EPA does not address this material because CERCLA expressly excludes remedial actions for petroleum products.

The RI and FS include discussions of an oily debris area located in the northern section of the Coakley site. This area consists of a clay-lined and capped cell where debris from the cleanup of an oil spill, which occurred in the Portsmouth/Newington area, was placed in

Mr. Steven J. Calder
U.S. Environmental Protection Agency
Waste Management Division
Page Four

1978 and 1979. The debris consisted of oil-saturated booms and adsorbent packaged in plastic bags, as well as oil-saturated snow. The alternatives evaluated in the FS also included various options for the re-disposal of this material in conjunction with the cleanup of the landfill proper. EPA's preferred alternative, however, does not include any actions that would involve the handling of the oily debris. EPA did not address this material in its preferred alternative because CERCLA expressly excludes the performance of remedial actions for petroleum products unless they are specifically listed or designated as hazardous substances. The decision on the final disposition of this material has been referred to the State of New Hampshire.

Therefore, Jet-Line respectfully requests either copies of documents which demonstrate that Jet-Line sent hazardous substances to the site. Otherwise, Jet-Line expects that it will be removed from the list of Potentially Responsible Parties.

I would also appreciate that you amend your mailing list and send all future correspondence to my attention. Thank you for your attention to this matter.

Very truly yours,

JET-LINE SERVICES, INC.



Neal M. Drawas, C.E.P.
Senior Vice President

NMD:bk

VIA FEDERAL EXPRESS
AIRBILL NO: 7879242906